

AO 91 (Rev. 11/11) Criminal Complaint

## UNITED STATES DISTRICT COURT

for the

District of New Mexico

United States of America

v.

Willie ESPINOZA

Case No.

19-3564MJ

Defendant(s)

## CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of October 6, 2019 in the county of Dona Ana in the  
State and District of New Mexico, the defendant(s) violated:

Code Section

Offense Description

8 USC 1324 (a)(1)(A)(iii)  
 8 USC 1324 (a)(1)(A)(v)(I)

Harboring Illegal Aliens  
 Conspiracy to Harbor Illegal Aliens

This criminal complaint is based on these facts:

See attached Affidavit

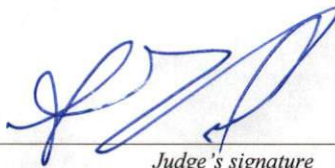
☒ Continued on the attached sheet.


Complainant's signature

Rene Robles, Special Agent

Printed name and title

Sworn to before me and signed in my presence.

Date: 10/08/2019


Judge's signature

City and state: Las Cruces, New Mexico

Stephan Widmer, United States Magistrate Judge  
 Printed name and title

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW MEXICO

VS

Willie Espinoza

On or about October 6, 2019, Sunland Park Police Department (SPPD) Officers received a service call regarding the possible kidnapping of two females who were being held at 103 3<sup>rd</sup> Street, Sunland Park, New Mexico. SPPD Officers conducted a welfare check at 103 3<sup>rd</sup> Street, which is an apartment duplex. As SPPD officers arrived at the location, two females came running out of 103 3<sup>rd</sup> Street, Apartment B. The two females appeared to be in distress and crying as they asked the SPPD officers for help in Spanish. The two females informed SPPD that they were smuggled from Mexico into the United States.

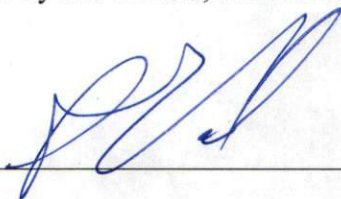
SPPD Officers contacted Homeland Security Investigations (HSI) for assistance. Both females were interviewed by HSI. Through questioning, HSI determined the individuals were not citizens of the United States and did not possess proper immigration documents that would allow them to be or remain in the United States legally, and are sisters. HSI determined the two females were citizens of Cuba who were smuggled into the United States. The illegal aliens stated they were being charged \$1,000.00 to be smuggled from Ciudad Juarez, Mexico to El Paso, Texas. The illegal aliens stated they crossed illegally near the Bridge of the Americas Port of Entry, and were transported by two individuals to a stash house, and subsequently moved to 103 3<sup>rd</sup> Street, Apartment B in Sunland Park.

One of the two females that ran out of 103 3<sup>rd</sup> Street, Apartment B, ("Material Witness 1") stated they were instructed not to leave the residence and were locked in the house. Material Witness 1 stated she and the other female were being held at this location for the past two days (October 4, 2019). Material Witness 1 also stated that she had her phone removed and would only be allowed to use it occasionally to contact family members. Material Witness 1 stated that Willie ESPINOZA was the man holding them at the residence. Material Witness 1 observed ESPINOZA had a firearm in his possession which he kept in his front waistband. Material Witness 1 stated ESPINOZA asked her brother, who resides in the United States, for \$1,500.00 to release them. SPPD Officers confirmed that ESPINOZA resides at 103 3<sup>rd</sup> Street, Apartment B.

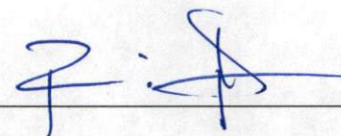


The second female being held at 103 3<sup>rd</sup> Street, Apartment B, ("Material Witness 2") stated that she and Material Witness 1 slept on the living room couch and ate maybe once per day. Material Witness 2 stated that ESPINOZA manipulated her phone against her will and contacted her friends and family to discuss smuggling arrangements. Material Witness 2 stated that in addition, ESPINOZA took a photo of his New Mexico Identification Card, and sent it via message to Material Witness 2's brother and asked to be wired \$1,500.00. Material Witness 2 also had access to her phone intermittently and was able to communicate with her brother who informed her the \$1,500.00 was wired via Western Union. Material Witness 2 stated that after her brother provided the \$1,500.00, ESPINOZA purchased Amtrak train tickets under her and Material Witness 1's names. Both Material Witnesses stated that after ESPINOZA received the \$1,500 through wire transfer, he demanded more money from them. Material Witness 2 also stated ESPINOZA would three-way video call with additional co-conspirators of this Alien Smuggling Organization using Material Witness 2's phone, to discuss details of the smuggling arrangements.

HSI Special Agents telephonically spoke with the brother of the Material Witnesses who stated that ESPINOZA and other unknown individuals contacted him by phone between October 5 and 6, 2019, requesting money for the release of the two illegal aliens. The brother of the Material Witnesses also confirmed that he received ESPINOZA's identification photo, and subsequently wired \$1,500.00 dollars to Judith CLOUSER, ESPINOZA's wife, as instructed by ESPINOZA. Furthermore, Material Witness 2 had a photo in her phone of the Western Union receipt sent to her by her brother, which corroborated this information.



United States Magistrate Judge  
District of New Mexico



Rene Robles  
Special Agent  
Homeland Security Investigations

Subscribed and sworn to before me on October 8, 2019.